

Chuck Fleischmann for Congress Committee, Inc.
P.O. Box 11091
Chattanooga, TN 37401

Kim
Collins

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February 9, 2015

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Kim Collins, Paralegal
999 E Street, NW
Washington, DC 20436

**RE: Complaint of Dennis E. Norwood against Chuck Fleischmann for Congress Committee, Inc.
MUR 6909**

Dear Ms. Collins:

I am in receipt of the notification letter from Jeff S. Jordan as of January 26, 2015, with the Federal Election Commission Office of Complaints Examination and Legal Administration citing you as our contact relative to the above captioned complaint. Per my conversation with you on January 27, 2015, and as noted in the letter to me, this letter serves as my timely response within the designated 15-day window.

Thank you for the opportunity to respond to the allegations Mr. Norwood levied in his complaint. The complaints are without merit and I will detail my responses to each complaint below.

COMPLAINT 1 – Mr. Norwood alleges that the filing record shows a propensity of violations to an extent that there is an appearance of intent to commit campaign finance fraud.

RESPONSE – Mr. Norwood's allegations are not only ill-advised and reckless, but also wholly unsubstantiated. The Committee has always taken the utmost care to avoid even the appearance of impropriety in its dealings, and placed a strong emphasis on closely communicating with our Campaign Finance Analyst, Vicki Davis, always responding to her requests for additional information in a timely fashion. To my knowledge, there are no specific occurrences or pending unanswered requests dated prior to Mr. Norwood's complaint.

COMPLAINT 2 – Mr. Norwood alleges the Campaign accepted contributions from other federal elected officials and candidates in excess of mandated limits.

RESPONSE – Indeed, we did receive contributions from other campaigns that exceeded federally mandated limits on campaign contributions from other campaign committees. These excess funds were re-designated or refunded to the campaign committee that contributed the excess funds, in accordance with Ms. Davis' instructions for resolution. Per discussion with Ms. Davis, these matters were closed. Please see amended 2nd Quarter report filed 10/20/2014 and Post-general report dated 12/4/2014.

COMPLAINT 3 – Mr. Norwood alleges the Campaign accepted a forbidden contribution from the Texas Opportunity Partnership in the amount of \$20,000, and that the Campaign failed to respond to the FEC's request for additional information on this transaction.

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RESPONSE – Mr. Norwood's allegations are untrue. The Campaign never received a contribution or transfer of funds from Texas Opportunity Partnership of \$20,000. We received less than \$4,000 from this joint fundraising organization. The request for additional information cited that the Campaign had failed to amend its Statement of Organization to include Texas Opportunity Partnership as an authorized joint fundraiser. Subsequent to receipt of this notification from Ms. Davis, we amended the Statement of Organization to include Texas Opportunity Partnership as an authorized joint fundraiser. Per discussion with Ms. Davis subsequent to the filing of this amendment, the matter was closed. Please see amended Statement of Organization filed 11/10/2014.

COMPLAINT 4 – Mr. Norwood alleges voter fraud in connection with the production and distribution of a flyer wherein Mr. Wamp's (an opposing candidate in the primary election in 2014) likeness was included.

RESPONSE – This matter is beyond the scope of my influence, control and responsibility. Mr. Norwood expresses in his complaint that he, "understand[s] that this is out of [FEC] jurisdiction...." Indeed, I do not control campaign advertising or strategy. My responsibility is limited to control over the functions of the treasurer. In any event, there has been no notification of which I am aware from any regulatory agency that the Campaign had violated any laws in connection with the distribution of this flyer.

Again, thank you for the opportunity to respond to these allegations. Please feel free to contact my Campaign Finance Analyst at the FEC for further clarification regarding any of these issues. Please let me know if you have any additional questions or concerns relative to this or any other matter upon which I might be of assistance.

Sincerely,



Randall B. Hebert, MBA, CPA, CVA, CGMA
Treasurer